OBSERVATION REPORT #94

Bell Atlantic's process for implementing, documenting and tracking metrics change proposals is inadequate and incomplete.

Issue 94.1

During the course of investigating the Bell Atlantic-Massachusetts' (BA-MA) change management process for Provisioning metrics, KPMG encountered several instances of inconsistent adherence to the change process, particularly implementation, documentation and tracking of changes.

KPMG found that the timeliness of actual changes implemented conflicts with the timeliness of changes recorded in the BA-MA monthly Tracking Register. For example, Change Control Request CC200018 dictates that KPMG should begin using "Frame Delay Time" to identify "Hot Cut" transactions on February 10, 2000. However, BA-MA implemented actual coding changes as early as January 2000.

KPMG also found that BA-MA occasionally combines several unrelated changes within the same Change Control Request. For example, in the same Change Control Request, BA-MA combined one change, which affects "hot cut" metrics, with another change, which affects "delay days" metrics.

Issue 94.2

During the course of replicating the BA-MA Pre-Ordering performance metrics (PO-1 family), KPMG encountered several instances of undocumented changes in the algorithms used for metrics calculation. KPMG found that BA-MA changes are often imbedded in PERL or Visual Basic programming codes and not documented on a higher level understood by a non-technical audience. Additionally, KPMG did not receive timely and complete notification of changes.

For example, in February 2000, BA-MA changed the script names used to identify particular transaction types (Customer Service Request, Due Date Availability, etc.) only in their PERL programming code. KPMG uncovered these changes after encountering difficulty in replicating the metrics with the December BA-MA PERL code. BA-MA did not document these changes in either a higher-level algorithm or in their Tracking Register.

<u>Issue 94.3</u>

When replicating the BA-MA Response Time OSS Maintenance Interface (Caseworker) performance metrics, KPMG encountered instances of undocumented changes in the algorithms used for metrics calculation.

KPMG successfully replicated the metrics on the February 2000 Carrier-to-Carrier report (C2C) using the BA-MA algorithm entitled, "MR-1 Collection and processing.doc." However, KPMG could not replicate the December 1999 and January 2000 metrics, when applying the same algorithm. BA-MA has not provided any documentation that indicates the algorithm was different in December or January.

For example, the tables below illustrate selected metrics that KPMG could replicate for February, but could not replicate for either December or January.

		BA Value	KPMG	
February 2000		on C2C	Value	Difference
MR-1-04	Request Cancellation of Trouble	8.56	8.56	0.00
MR-1-06	Test Trouble (POTS Only)	66.82	66.82	0.00
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January 2000				
MR-1-04	Request Cancellation of Trouble	8.61	9.68	-1.07
MR-1-06	Test Trouble (POTS Only)	65.23	62.82	2.41
December 1999				
MR-1-04	Request Cancellation of Trouble	8.43	8.30	0.13
MR-1-06	Test Trouble (POTS Only)	56.8	58.42	-1.62

Assessment

CLECs may be adversely impacted by the inconsistent implementation and tracking of changes and inadequate notification process.